



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

DEC 8 1993

Ms. Beverly Hartsock  
Deputy Executive Director  
Office of Air Quality  
Texas Natural Resource  
Conservation Commission  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Draft Protocol for El Paso CO SIP Analysis  
Carbon Monoxide Modeling and Control  
Strategy for El Paso County  
CAAA-IV-113

Dear Ms. Hartsock:

This letter is in response to Dru Skagg's letter of September 3, 1993, enclosing a draft Gaussian-Plume Multiple Source Air Quality Algorithm (RAM) protocol for the El Paso carbon monoxide (CO) Section 818 analysis. The receipt of the proposed protocol meets the FY 1992 grant objective CAAA-IV-113 that required a work plan and schedule for conducting the CO analysis.

We have had several conversations and conference calls between your staff and the Regional Office regarding this proposed protocol. It is understood that the El Paso situation is unique due to its shared airshed with Juarez and the analysis will only deal with the U.S. side of the border. As you probably know, Section 818 of the Clean Air Act Amendments provides a nonattainment area on an international border the opportunity to demonstrate that it would attain the National Ambient Air Quality Standards were it not for emissions from a foreign country.

As pointed out in our letter of February 5, 1993, the CO demonstration ideally would be conducted using the Urban Airshed Model (UAM) as this is considered to be the preferred model for CO. However, the lack of Juarez monitoring data and a completed emission inventory make validation of the UAM modeling results as required in the Environmental Protection Agency's (EPA) modeling guidelines impossible.

2

Although RAM is an EPA guideline CO model, there are some legitimate concerns pointed out in the protocol and in our various conversations regarding the use of RAM for the El Paso CO Section 818 analysis. The RAM model tends to underpredict ambient air concentrations during certain stagnation periods or periods of low wind speeds.

The Region has reviewed your protocol and agrees generally with the Texas Natural Resource Conservation Commission's (TNRCC) proposed use of RAM if a modified approach can be developed to use monitoring data for those low stagnation episodes in which RAM tends to underpredict. The protocol also proposes to use the CAL3QHC intersection model, which is required by EPA guidelines.

We are willing to work with TNRCC staff to develop an approach that will handle situations where RAM fails to predict accurately. Quang Nguyen, our Regional Modeler, will be in further contact with your staff regarding assistance he can provide in this matter.

One other area needs to be addressed in the protocol and that deals with future basinwide modeling that will take place once there is sufficient monitoring data and an emissions inventory for Juarez. Such modeling is required by the 1983 La Paz Agreement between the United States and Mexico. The TNRCC has committed to perform such basinwide modeling in its 1992 El Paso CO SIP. Similar language should be included in this protocol.

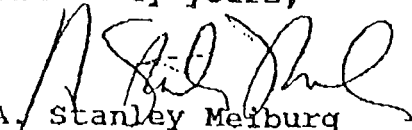
The Regional Office will approve your protocol allowing for the use of the RAM model for the El Paso CO Section 818 analysis when we have agreed upon an approach to handling stagnation episodes and when revisions have been addressed in a final protocol.

We congratulate the TNRCC staff for its diligent efforts to develop this model protocol for the El Paso CO analysis and its flexibility in working with the Regional Office to gain acceptance of the protocol.

In order to expedite the approval process, we are asking that you send the revised protocol to us by December 31, 1993.

If you have questions, please call me or have your staff call Tom Diggs at (214) 655-7214, Quang Nguyen at (214) 655-7238 or Pat Cupp at (214) 655-8015.

Sincerely yours,



A. Stanley Meiburg  
Director

Air, Pesticides & Toxics Division (6T)

3

cc: James Braddock  
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